

REMARKS

This application has been carefully reviewed in view of the above-referenced Office Action, and reconsideration is requested in view of the following remarks.

In response to the Office Action mailed on February 23, 2007, Applicant wishes to enter the following remarks for the Examiner's consideration. Claims 1, 3-12, and 14-24 are pending in the application. No claims have been amended in this response.

Claim Rejections – 35 USC 102

Claims 1, 3, 5-7 and 22-24 are rejected under 35 USC 102(b) as being anticipated by Knapp, Jr. et al. (U.S. Patent No. 4,616,207), hereinafter the '207 reference. Applicant respectfully traverses this rejection of the claims.

Applicants repeat the arguments put forth in the response of November 22, 2006 in traversing the rejection of the claims over the Knapp reference. The examiner again has asserted the Knapp reference against claims 1, 2, 5-7 and 22-24. Applicant must renew the argument and observation that the '207 reference does not teach a bracket having a bulkhead retaining portion. The examiner again references item 63 of '207 as a bracket but the reference states that item 63 is a "top supporting wall of the fuse base" at column 5 lines 30-31. This means that item 63 must be non-conducting; otherwise, it will be "hot" electrically if the screw shown is metal and/or if item 74 ("current carrying interconnecting member:") is metal as it must be for sensor 80 to work. No bulkhead retaining portion is shown, and even if it were the screw, as put forth by the examiner, item 74 would make the bulkhead "hot". In truth connector 70, interconnecting member 74, and fuse holder end 68 are all electrically "hot" as they must be for current sensing arrangement 78 to work. No

bulkhead retaining portion is envisioned or described by '207 for the above components. The present invention does not teach any "hot" bracket, of course.

Furthermore, with regard to the protective device element of the claims, please consider the following. The examiner fails to acknowledge that in Fig. 6 the electrically active fuse end (fuse clip 68) is used to connect to top supporting wall 63, the screw, current carrying interconnecting member 74, and connector 70.

The examiner states that down section 76, Fig 6, of '207 is a protective device mounting tab portion to which the protective device is coupled by the retaining portion". This is not correct; reference '207 identifies item 76 as a "loop", and it is there only to encircle current sensing arrangement 78. It is not a tab for the purpose of mounting the fuse holder or anything else. It is also electrically hot and is required to be so, in contrast to fuse holder mounting tabs of the present invention.

Regarding claims 6-7 and 24, the examiner claims that '207 describes a plurality of protective devices and a plurality of tab portions of the bracket, and the retaining element further comprises a plurality of retaining elements (Fig 10). '207 teaches that the three fuse holders are the same, as in Fig 1, col 7 lines 28-31. This means that each is subject to the same discussion as previously given, see above. If the bracket of the present invention were connected to one side of a particular fuse electrically, Applicants fail to see how the bracket could also be connected electrically to any side of another fuse at the same time, much less to multiple fuses. Even if one hot bulkhead was acceptable, '207 would require the bulkhead to be hot multiple ways. Yet this is what must be done if '207 is construed to anticipate the claims of the present invention.

With regard to claim 3, Applicants do not find the tab portion of claim 3 identified in '207 by the examiner; it is not understood, or indeed supported by the '207 reference, to assert that loop 76 is a tab.

With regard to claim 5, it appears that the examiner is referencing names and functions for mechanical elements that '207 does not describe or teach. Please see above discussion.

Claims 8-11, 16 and 20-21 are rejected under 35 USC 102(b) as being anticipated by Pearsall, Jr. et al. (U.S. Patent No. 3,965,397), hereinafter the '397 reference. Applicant respectfully traverses this rejection of the claims.

Regarding claims 8 and 16, '397 Frame 12 is not a bracket assembly as the examiner asserts; it is the wall of an apparatus case, '397 column 2 line 5. It is therefore a bulkhead. No bracket assembly is taught by '397 which attaches to this or any other bulkhead. Item 11, which the examiner mistakes for a bracket, is described as, "cavity 11. Cavity 11 is a triangular-shaped hollow formed within wall 12 of an apparatus case.....Within cavity 11 on one wall is mounted aconnector assembly.....", '397 column 2 lines 4-14. Cavity 11 is therefore a hollow section of a bulkhead wall 12, and a bracket for attaching to this bulkhead, or to wall 12, or to cavity 11, is mentioned nowhere in '397. Additionally there is a special spatial relationship required of connector 14 and fuse holders 17 and 18, see '397 column 2 lines 30-41. This special relationship is further described by '397 column 2 lines 51-59. There are no special spatial relationships required by the present invention.

While the examiner states that '397 teaches the recitations of claim 9 in Figures 2-3 of '397, Applicants can find no such assembly. Applicants therefore

respectfully request the Examiner to be specific about how these figures of '397 anticipate the language of claim 9.

With regard to claims 10-11, Applicants can find no bracket assembly described by '397, as the connector and the fuse holders are mounted into the bulkhead.

Clarification of the examiner's position with regard to these two claims is respectfully requested.

Regarding claims 20-21, '397 does not allow for insertion of the assembly through the bulkhead, as discussed above. '397 also does not allow for coupling a bracket assembly as recited by element 2 of claim 20, as no bracket assembly is described by '397, as previously discussed. Additionally, claim 21 requires two bulkhead surfaces, which the examiner has failed to identify in the '397 reference.

Claim Rejections – 35 USC 103

Claims 14, 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Piersall Jr in view of Sundt (US 2,783,331). Applicants respectfully traverse this rejection of the claims.

The examiner states that the '397 reference discloses the claimed invention except for the protective device mounting portion being a tab portion. The '331 reference is relied upon as disclosing this recitation of the claims.

First, as discussed above, the '397 reference in fact fails to teach the recitations of claim 8, from which claims 14 and 17 depend, and the combination of '331 with '397 fails to cure this defect. So, even if '331 taught the protective device

mounting portion is a tab portion of a bracket assembly, the combination would nevertheless fail to render claims 14 and 17 unpatentable.

Second, applicants respectfully submit that the interpretation of the '331 reference put forth in the office action is not correct. No tab portion is shown in '331. Figure 4 is a protective cover, not a tab. The mounting of the device of Figure 4 is by two studs 23, which are the fuse electrical connections. The tabs of the present invention require no such mounting as they are a part of the bracket.

Claims 12 and 19 are rejected under 35 U.S.C. 103(a) as being unpatentable over Piersall Jr in view of Lo et al. (US 6,875,052). Applicants respectfully traverse this rejection of the claims.

The examiner asserts that with regard to claim 12, the '397 reference teaches the claimed invention except for first and second output connectors coupled to a plurality of cables of the assembly. However, as noted above, the '397 reference fails to anticipate the recitations of claim 8, from which claim 12 depends. With regard to claim 19, the '052 reference does not teach the inclusion of protective devices, integral or otherwise. Moreover, the power cabling assembly method of claim 19, even if necessitated by the product structures, is not obviated by the combination of '397 and '052. As discussed above, the structures of the '397 and '052 references, whether considered singly or in combination, fail to teach product structures that would necessitate the method of claim 19.

Allowable Subject Matter

Applicants note with appreciation that claims 4, 15 and 18 are objected to but would be allowable if rewritten in independent form. While Applicants agree that these claims recite patentable subject matter, it is believed that because they depend from claims that are believed to also recite patentable subject matter, as discussed above, these claims should be allowable as written. Applicant do, however, reserve the right to depend claims 4, 15 and 18 to be in independent form at a later date if so desired.

Conclusion

In light of the foregoing amendment and remarks, Applicants respectfully submit that the references cited does not teach, suggest, disclose or otherwise anticipate, or obviate, the claim language of the pending claims. Applicants thus respectfully request that this basis of rejection of the claims be withdrawn and that a Notice of Allowance for these claims be mailed at the Examiner's earliest convenience.

Although additional arguments could be made for the patentability of each of the claims, such arguments are believed unnecessary in view of the above discussion. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

All claims are believed to be in allowable condition and such allowance is respectfully requested at the Examiner's earliest convenience. The Examiner is cordially invited to contact the undersigned if there are any questions about this application or response.

Respectfully submitted,
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Dated: May 21, 2007